PLEASE ADVISE!



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Environmental Activities Staff

RECEIVED EPA/REGION IV General Motors Corporation General Motors Technical Center Warren, Michigan 48090

FEB 23 10 58 hit '0 February 20, 1981

EMFORGEREERT DIVISION

Mr. Paul Keith RCRA Activities U.S. EPA Region IV 345 Courtland Street, N.E. Atlanta, GA 30365

Dear Mr. Keith:

Attached is a copy of the November 10, 1980 letter issued by the U.S. EPA General Counsel allowing General Managers of General Motors Corporation to sign the permit applications required under the Consolidated Permit program. Although the EPA letter was copied to all EPA Regional Counsels and Enforcement Directors, the attached copy is provided for the convenience of you and other persons in the RCRA Activities group of EPA Region IV.

Should you have any questions, please contact me by calling (313)575-8602.

Very truly yours,

Joseph P. Chu

Senior Staff Engineer

JPC:ear

Attachment



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

NOV 1 0 1980

OFFICE OF GENERAL COUNSEL

Louis E. Tosi, Esquire Fuller, Henry, Hodge & Snyder 300 Madison Ave., 1200 Edison Plaza Post Office Box 2088 Toledo, Ohio 43603

Dear Mr. Tosi:

This is in response to your November 4 petition on behalf of General Motors Corporation (GM) for relief from certain signatory requirements under the Consolidated Permit regulations. Although GM's request extends to all permits governed by the Consolidated Permit Regulations, the corporation appears to be particularly concerned about meeting those requirements in time to file a RCRA permit application by the November 19, 1980 deadline set forth in EPA's regula-For the reasons stated below, I believe that correct tions. interpretation and application of the regulations will substantially reduce the burden on GM such that compliance can be attained by the RCRA November 19, 1980 filing deadline. understand that upon receipt of this letter GM will withdraw its November 4, 1980 petition except as to item 3 on page 1, relating to owners and operators. Further, we agree that withdrawal of the petition will not prejudice any rights GM has to continue litigation or file additional petitions.

On May 19, 1980, EPA issued final Consolidated Permit regulations. 40 CFR Parts 122, 123 124 and 125 (45 FR 33290). Section 122.6 of these rules requires corporate permit applications to be signed "by a principal executive officer of at least the level of vice president." The section also requires a particular form of certification by the signer.

After publication of these rules, representatives of chemical and other industries requested clarification of some of the key terms of the signatory requirements of §122.6. In response, EPA published in the August 8, 1980 Federal Register a policy statement explaining the Agency's interpretation of the regulation. 45 FR 52149. The policy statement stressed, among other things, that the requirement for a vice president to sign would be interpreted to include officials with other titles but similar "policy-making functions." It further stated that the level of inquiry required by the form of certification would generally be construed to mean a "good faith effort"

to ascertain whether the submitted information meets applicable requirements.

On November 3, 1980, you sent to EPA a petition on behalf of GM asking for relief from the signatory and certification requirements in Section 122.6. GM stated that it must file 235 RCRA interim status applications by November 19, 1980. Moreover, GM has 73 plants with NPDES permits, although not all these permits require applications for renewal at the same time. GM had identified only six or seven corporate officials who would clearly be authorized to sign all these applications. Contending that the number of applications and the level of burden is unduly high, GM asked EPA either to advise that plant managers can sign the applications, or to suspend or amend the regulations to relieve the claimed burden on the corporation.

GM argued that the signatory requirement places an unnecessary burden on vice presidents because it requires of them a level of inquiry impossible for anyone above the plant manager level. Thus, it contended, the regulations require the vice president to read not only the application, but also all attachments to the applications, which may run to hundreds of pages. They must also, GM said, have a working knowledge of analytical methods, general engineering and chemical principles, and each plant's detailed processes and facility layout. According to GM, virtually all signers would need to be "skilled in environmental science," have "daily contact with the plant," and make inquiries of every person in the plant who had anything to do with gathering information for the application.

On November 6, you and Mr. Leonard Charla of GM met with representatives of my office and the Office of Enforcement to discuss your petition. Based on information presented in your petition, and orally at the meeting, I believe GM's misreading of the regulations caused it to overstate its difficulties in compliance.

First, GM's corporate structure allows the burden to be spread more than you assumed. GM is divided into 39 operating divisions, 28 of which are headed by officers who are vice presidents of General Motors Corporation. Mr. Charla stated that those divisional managers who are not vice presidents have equivalent responsibilities within their divisions to

the divisional managers who are designated vice presidents. Because their functions are the same, those officers are "at least the level of vice president," and are accordingly authorized to sign permit applications.

Moreover, EPA's regulation, as interpreted in the August 6, 1980 policy statement, was not intended to require vice presidents to acquire the technical expertise of plant engineers or environmental scientists. Like any manager, a vice president must rely upon subordinates to establish the system of checks and cross-checks that will enable him or her to sign with assurance that the information is complete and correct. As the certification indicates, the vice president must examine the application. EPA does not expect high corporate officials to wade through multi-volume modeling studies for PSD permits or lengthy attachments to permit applications consisting of raw data, although they should understand what these documents contain, why they are being provided, and how they will be used. Having examined the application, the vice president must then assure its accuracy and completeness. A corporate official is not expected then to have the technical expertise to parse every line on the form, nor to take the time to cross-examine the scores of employees that may have participated in its preparation.

Instead, as is stated in the preamble to the 1979 NPDES regulations in which the signatory requirement first appeared, "the signatory may rely on the representations of the person immediately responsible for obtaining the information in the document when certifying to its accuracy, etc." 44 Fed. Reg. 32860 (June 7, 1979). The person "immediately responsible" is not, as your petition assumes, the person who performs the sampling.

We expect in most cases that a plant manager or plant or corporate environmental supervisor will supervise collection of the information. Vice presidents are entitled to rely upon such persons in making inquiries regarding the accuracy of information. As the policy statement indicates, only if inquiry of these individuals fails to provide a reasonable basis to assure the accuracy and completeness of the information is further inquiry necessary.

As to the problem identified on p. 1, Item 3 of your petition, EPA recognizes that some operators of RCRA facilities have encountered difficulties in securing appropriate signatures and certifications from owners. In such cases, EPA advises operators to submit the application, in compliance with such of the signatory and certification requirements as apply to operators, and an explanation of the steps the operator has taken to secure the owner's compliance.

Please let me know if you need further assistance.

Sincerely,

Michele Beigel Corash

General Counsel

cc: Service List

Consolidated Permits Litigation

Regional Counsel

Regional Enforcement Division Directors



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET ATLANTA. GEORGIA 30365

JUN 1 1 1984

4AW-RM

Mr. B.B. Sorchecich
Environmental Control
Facilities and Planning
General Motors Warehousing
and Distribution Division
6060 West Bristol Road
Flint, Michigan 48554

Re: EPA I.D. No. GAD 000 814 343

Dear Mr. Sorchecich:

The State of Georgia has been granted Phase I and II (A & B) Interim Authorization to operate their State Hazardous Waste Program in lieu of the Federal Program under the Resource Conservation and Recovery Act; therefore, your request is being forwarded to Georgia for processing.

If you have questions concerning this or need other information relating to your facility, you should contact the Hazardous Waste Management Agency whose address is:

Mr. John Taylor, Acting Chief
Land Protection Branch
Environmental Protection Division
Georgia Department of Natural Resources
270 Washington Street, S.W.
Room 824
Atlanta, Georgia 30334

If this office can be of further service to you, please contact Nell Keever at (404) 881-3446.

Sincerely yours,

James H. Scarbrough, Chief Residuals Management Branch

Air & Waste Management Division

cc: Georgia Department of Natural Resources



November 11, 1983

EPA Region IV 345 Courtland Street Atlanta, Georgia 30365

Attention: Ms. Rita Ford

RE: EPA #GAD000814343 - Atlanta, Doraville

Dear Ms. Ford:

Enclosed, please find a revised copy of page 3 of 5 of the Part A RCPA application. At this time we are requesting deletion of the original listed wastes and quantities. These wastes were originally listed due to a misunderstanding of the regulations.

General Motors Warehousing and Distribution Division hereby requests that the status of the above referenced facility be changed from full TSDF to Small Quantity Generator. In addition, we request that we retain our EPA ID number for future use should the nature of our operations change.

If I can be of further assistance, please contact me at 313-635-6614.

Sincerely,

B. B. SORCHECICH

Environmental Control Facilities and Planning

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SUPPLEMENTARY DETAIL TO SECTION C - COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES

The commercial chemical products identified by the code numbers listed in Section C (as listed in Subpart D, Section 261.33) are not, by generic name, purchased, manufactured, or used in formulating any other commercial chemical product by General Motors Parts Division. However, these chemicals are known to be present in various proportions in some of our distributable products which have been or may be handled by General Motors Parts Division in the course of our business and which have been or may become subject to storage and/

If you have any questions or comments concerning this matter, please notify the installation contact shown in Section IV of the form.



JOE D. TANNER
Commissioner

Department of Natural Resources

ENVIRONMENTAL PROTECTION DIVISION 270 WASHINGTON STREET, S W. ATLANTA, GEORGIA 30334

January 31, 1984

J. LEONARD LEDBETTER

Division Director

Mr. L. L. Browning, PDC Manager General Motors Corporation Warehousing & Distribution 6060 West Bristol Road Flint, Michigan 48554

Dear Mr. Browning:

This will acknowledge receipt of your request for withdrawal of your application for a Hazardous Waste Facility permit.

Based on the information provided, withdrawal of your application is warranted and your permit application has been placed in our inactive files.

As requested, your status has been changed to a small quantity generator and your EPA Identification Number has been retained.

Please be avdised that withdrawal of your permit application invalidates any variance that you received to continue existing hazardous waste treatment storage or disposal during the permit review process and that based on our concurrence with your withdrawal request, the Federal Environmental Protection Agency will terminate your facility's interim status.

Should you wish to treat, store, or dispose of hazardous waste in the future, it will be necessary that a hazardous waste handling permit be issued, prior to the construction of such facilities, under authority of Section 8 of the Georgia Hazardous Waste Management Act and Section 391-3-11-.10 and.11 of Georgia's Rules for Hazardous Waste Management.

If further clarification is needed on this matter, please feel free to contact Alan Laros at 404/656-7802.

Sincerely,

John D. Taylor,

Program Manager

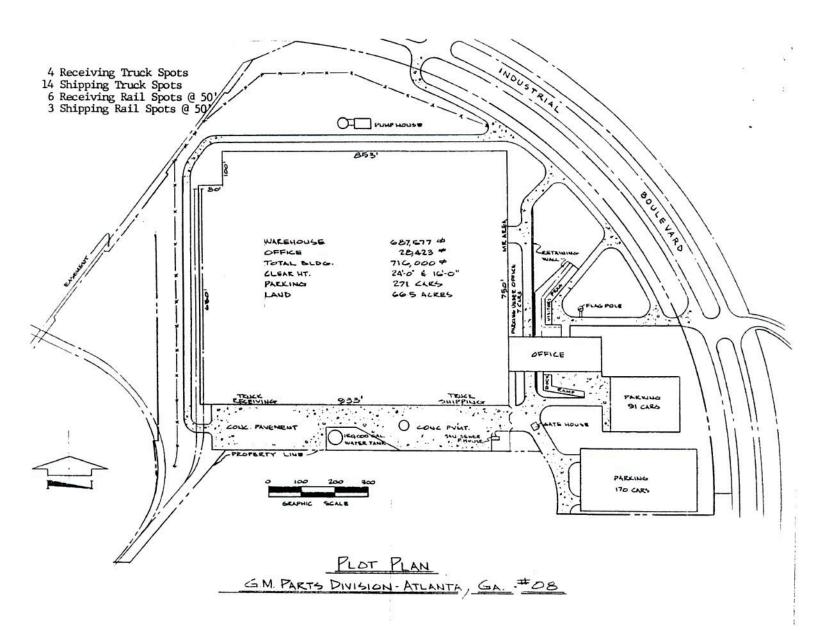
Industrial & Hazardous Waste

Management Program

JDT:alb:12

cc: James H. Scarbrough File: GM Parts Div. (Y) Part A, Permit Process --- Internal Checklist

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5. 1 sear our base 2.
1/21'E, Figurecopy this pane before completing if you have more than 26 wastes to list.

FOR OFFICIAL USE ONLY

Form Approved OMB No 158-520004

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FORM U.S. ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE PERMIT APPLICATION

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B. SUBSEQUENT NOTIFICATION (complete item C)

A. FIRST NOTIFICATION

IX. DESCRIPTION OF HAZARDOUS WASTES

DET

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C. INSTALLATION'S EPA I.D. NO.

				WCADEER	31/1/5/11 31
		no to the state of from fr	ont!		10.35 41128 153.34
X. DESCRIPTION OF HA	COECIEIC	COLIDCES FRIER TOP TO	our-didit number mom-	10 CFR Part 261.31 fo	r each listed hazardous
A. HAZARDOUS WASTES FI waste from non—specific so	ources your installation	- I I	anedts it necessary.		6
1	2	3	H-i	Hill	
				121 1 10	23 - 26
22 - 26	23 - 26	33 - 16	10	11	12
7	-	1	TiT		
			13 1 20	23 - 24	23 . 26
B. HAZARDOUS WASTES F	POM SPECIFIC SOUR	CES. Enter the four-di	git number from 40 CFF	R Part 261.32 for each	listed hazardous waste from
 B. HAZARDOUS WASTES F specific industrial sources y 	your installation handle	s. Use additional sheets	if necessary.		
13	14	15	16	17	18
	23 - 16	23 - 20	23 : 28	23 . 16	24
19	20	21	22	23	
					23 24
23 - 28	23 - 26	23 - 26	28	29	30
25	26	27	 		
				23 - 26	23 - 16
C. COMMERCIAL CHEMIC	13 · 26	ROOUS WASTES. Enter	the four-digit number	from 40 CFR Part 261.	.33 for each chemical sub-
C. COMMERCIAL CHEMIC stance your installation h	andles which may be a	hazardous waste. Use ad	ditional sheets if necessa	MY. JEE ATTACH	FULEN Y YA
31	32	33	34	35	36
Malela	110175	0080	11/5/9	0161	10/2/10
0101511	010113	23 - 26	23 - 26	22 - 24	42
37	38	39	40	41	11 1 1
11220	10/2/2/6/	0229	U239	0002	0054
23 : 38	23 - 28	22 - 16	46	47	48
43	44	48	111111	11160	0 - 3
10070	0112	0/122	01/15/4	13 - 20	23 - 26
23 - 26	ALACTES Enter the fo	ur_cligit number from 40	CFR Part 261.34 for ea	ch listed hazardous wa	ste from hospitals, veterinary
D. LISTED INFECTIOUS (hospitals, medical and re	search laboratories you	ir installation handles. U	se additional sheets if ne	cessary.	
49	50	51	52	53	54
23 - 38	23 - 20	23 - 16	23 · 16	exponding to the chara	cteristics of non-listed
E. CHARACTERISTICS Of hazardous wastes your in	F NON-LISTED HAZ	ARDOUS WASTES. Ma 40 CFR Parts 261.21	- 261.24.)	esponding to the share	
To the second se	74	_	⊠ 3. REA	CTIVE	4. TOXIC
(D001)	BLE	DO02)	(D003)	y =	(£000)
X. CERTIFICATION	7				
	ty of law that I has	ve personally examine	d and am familiar wi	th the information	submitted in this and all btaining the information,
attached documents,	and that based on r	ny inquiry of those is	ndividuals immediate	y responsible for old	btaining the information, nificant penalties for sub-
I believe that the sub mitting false informat					nificant penalties for sub-
	,			r print)	DATE SIGNED
SIGNATURE				L.L. BROWN A	· · · · · · · · · · · · · · · · · · ·
1 22/21	ay di ye	1200	C. Mais	· 17/1	7-12-56

I.D. - FOR OFFICIAL USE ONLY

EPA Form 8700-12 (6-80) REVERSE

NTINUED FROM THE FRONT	
II. SIC CODES (4-digit, in order of priority)	B, SECOND
A, FIRST	s (specify)
5.013 STORAGE - AUTO PARTS	7 1115 - 12
C. THIRD	D. FOURTH
(specify)	(specify)
	15 14 - 15
III. OPERATOR INFORMATION	B. Is the name listed In
A. NOME	itam VIII-A also th
GMC WHSG. &DISTRIBUTION	V DIV. FLINT
1 10 June 20 J	newer hox: if "Other", specify.) D. PHONE (area code & no.)
C. STATUS OF OPERATOR (Enter the appropriate letter into the ar	
S = STATE O = OTHER (specify)	A 3/3 633 34 / /
P = PRIVATE	A TANK THE PARTY OF THE PARTY O
6060 W. BRISTOL ROAD	10
F. CITY OR TOWN AND AND AND AND AND AND AND AND AND AN	G.STATE H. ZIP CODE IX, INDIAN LAND
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BFLINT	
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X. EXISTING ENVIRONMENTAL PERMITS	Sam Proposed Sources
A. NPDES (Discharges to Surface Water) D. PSD (Air Emis	ssions from Proposed Sources)
STIP NA	
9 N N N 2	THER (specify)
B. UIC (Underground Injection of Fluids)	(specify)
10 10 10 10 10 10 10 10 10 10 10 10 10 1	OTHER (specify)
CITED I	(specify)
9 RINA	
11 (1) (1)	
XI. MAP	ling to at least one mile beyond property boundaries. The map must show
the outline of the facility, the location of each of its existing a treatment, storage, or disposal facilities, and each well where it water bodies in the map area. See instructions for precise require	t injects fluids underground. Include all springs, rivers and other surface
Water bodies in the hisp act. See the print description	
XIL NATURE OF BUSINESS (provide a brief description)	
FACILITY UTILIZATION AND WHOLESALE DIST PARTS AND ACCESSOR	IS PRIMARILY FOR STORAGE. PRIBUTION OF MOTOR VEHICLE RIES.
XIII CERTIFICATION (see Instructions)	d and am familiar with the information submitted in this application and all
attachments and that, based on my inquiry of those person application, I believe that the information is true, accurate an false information, including the possibility of fine and imprison	nd complete. I am aware that there are significant penalties for submitting inment.
A NAME & OFFICIAL TITLE (type or print)	IGNATURE C. DATE SIGNED
L.G. KALUSH -GENERAL MANAGER	11/16/80
	DA Merus
COMMENTS FOR OFFICIAL USE ONLY	THE THE PERSON OF THE PERSON O
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If II - in areas we spaced for entertype, i.e., 12 charact	ers inch!	From Ague and 1999 Mr. 1722
HAZARDO	OUS WASTE PERMIT APPLICATION Consolidated Permits Program ation is required under Section 2005 of RCRA.)	I. EPA I.D. NUMBER 5 4 3 43 44
APPROVED (yr, 710, \$ day)	COMMENTS	
II. FIRST OR REVISED APPLICATION		12.5 c.
EPA I.D. Number in Item I above.	(mark one box only) to indicate whether this is the first d you already know your facility's EPA I.D. Number, or	application you are submitting for your facility or a if this is a revised application, enter your facility's
A. FIRST APPLICATION (place an "X" below an X is EXISTING FACILITY (See instructions for Complete item be	or definition of "existing" facility.	2.NEW FACILITY (Complete item below.) FOR NEW FACILITIES
8 7 3 0 1 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	6.7.1.70)	YA. MO. DAY (Yr., mo., & day) OPER TION SEGAN OR IS EXPECTED TO BEGIN
1. FACILITY HAS INTERIM STATUS		2. FACILITY HAS A RCRA PERMIT
III. PROCESSES – CODES AND DESIGN CAI	The state of the s	11
describe the process (including its design capacity)		be used at the facility. Ten lines are provided for that is not included in the list of codes below, then
 B. PROCESS DESIGN CAPACITY — For each code e 1. AMOUNT — Enter the amount. \ 2. UNIT OF MEASURE — For each amount enter measure used. Only the units of measure that a 	ed in column R/1) conserves and form it is a	neasure codes below that describes the unit of
PRO- APPROF	PRIATE UNITS OF	PRO- APPROPRIATE UNITS OF
PROCESS CODE DESI	RE FOR PROCESS IGN CAPACITY PROCESS	CESS MEASURE FOR PROCESS CODE DESIGN CAPACITY
Storage: CONTAINER (barrel, drum, etc.) 501 GALLON: TANK	S OR LITERS TANK	p 0
WASTE PILE SOS CUBIC Y	S OR LITERS ARDS OR SURFACE IMPOUNDMENT	TOI GALLONS PEEDAY OR LITERS PER DAY TOZ GALLONS PER DAY OR
SURFACE IMPOUNDMENT 504 GALLONS Disposal:	SOR LITERS INCINERATOR	TOS TONS PER HOUR OR
INJECTION WELL D79 GALLONS	S OR LITERS	METRIC TONS PER HOUR: GALLONS PER HOUR OR CUITERS PER HOUR
would cov depth of o	ET (the volume that OTHER (Use for physical, cleer one acre to a thermal or biological treatment processes not occurring in ta	LITERS PER DAY
LAND APPLICATION OCEAN DISPOSAL D81 ACRES OF GALLONS LITERS P	E-METER surface impoundments or inc R HECTARES ators. Describe the processes S PER DAY OR the space provided: Items	iner - Z
UNIT OF MEASURE	UNIT OF	UNIT OF
UNIT OF MEASURE CODE	UNIT OF MEASURE CODE	UNIT OF MEASURE CODE
GALLONS	LITERS PER DAY V TONS PER HOUR	ACRE-FEET
GALLONS PER DAY	GALLONS PER HOUR	HECTARES
EXAMPLE FOR COMPLETING ITEM III (chown in the	LITERS PER HOUR	age tanks, one tank can hold 200 gallons and the
	inerator that can burn up to 20 gallons per hour.	
DUP 1	111111111111	(
A. PRO- B. PROCESS DESIGN CAPAC		CESS DESIGN CAPACITY
CODE 1. AMOUNT (specify)	2. UNIT OF MEA OFFICIAL USE CODE CODE (from list above)	I. AMOUNT 2. UNIT OF MEA- SURE (enter code)
600		· 27 28 29 - 31
3-2T 0 3 20	E 6	
1 501 1440	G 7	
2	8	
3	9	
4	10	
16 - 16 19 - 27	20 20 . 32	

III. PROCESSES (continued)	FOR DESCRIBING OTHER PHOCESSES (code "TO4"). FOR EACH PROCESS ENTERED HERE

ī	V. DESCRIPTION OF HAZARDOUS WASTES
A.	EPA HAZARDOUS WASTE NUMBER — Enter the four—digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If y handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four—digit number/s/ from 40 CFR, Subpart C that describes the characte tics and/or the toxic contaminants of those hazardous wastes.
В.	ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an ann basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste/s/ that will be hand which possess that characteristic or contaminant.

C. UNIT OF MEASURE - For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropria codes are: E

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS		KILOGRAMS	K
TONS		METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking in account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item I to indicate how the waste will be stored, treated, and/or disposed of at the facility. For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process cod contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that posse that characteristic or toxic contaminant. Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the space are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the space are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the space are provided for entering process codes.

extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form. NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described I

more than one EPA Hazardous Waste Number shall be described on the form as follows: 1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annu

quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.

2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter the other EPA Hazardous Waste Number that can be used to describe the waste.

"included with above" and make no other entries on that line.

3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 poun per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wast are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 200 pounds per year of each waste. 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

		Α.	EP/	4		C. UNIT	L											D. PROCESSES
	W	AZ	AR	D. 00 de)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	OF MEA- SURE (enter code)				1	ı. P	RO	(en	008	::			2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K	0	5	4	900	P	7	'()	3	D	8	0			1		
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EFA Form 3510-3 (6-80)

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treatment and disposal areas; and sites of future	storage, treatment or o	disposal areas (see instruct)	ions for more	detail).	·
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E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

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111	PROCESSES (continued)			
-	SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (CODE 104)	. FOR EACH PROCES	SENTERE	DHERE
	INCLUDE DESIGN CAPACITY.		•	• •
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IV. DESCRIPTION OF HAZARDOUS WASTES

- A. EPA HAZARDOUS WASTE NUMBER Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number/s/ from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS		METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- 1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.

 2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter
- 'included with above" and make no other entries on that line.
- 3. Repeat step-2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

	A. EPA		C. UNIT	D. PI	ROCESSES
	HAZARD. WASTENO (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	OF MEA- SURE (enter code)	1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in $D(I)$)
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X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
Y-4	0002		111		included with above

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SIC CODES (4-digit, in order of priority)	B. SECOND
A, FIRST	s (specify)
013 STORAGE - AUTO PART.	5 7 12 12
10	D. FOURTH
C. THIRD	G (specify)
(specify)	7
	13 10 - 19
OPERATOR INFORMATION	B. is the name listed
	owner?
EMC WHSG. & DISTRIBU	TION DIV. FLINT SYES INC
EMC WHSG. ADISING	-1
	D. PHONE (area code & no.)
C. STATUS OF OPERATOR (Enter the appropriate lette	tel 0 (specify) 6 3 1 3 (6 3 5 5 4 7 4
M = PUBLIC (other than Jederal or 314	A 373 633 P
STATE O = OTHER (specify)	15 16 - 10 10 - 21 12
E. STREET OR P.O. BOX	
OLO W. BRISTOL ROAD	
060 W. BRISTOL ROAD	G STATE H. ZIP CODE IX. INDIAN LAND
F. CITY OR TOWN	G.STATE H. ZIP CODE IX. INDIAN LAND
	M / 4 8554 TYES SINO
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	42 · · · · · · · · · · · · · · · · · · ·
EXISTING ENVIRONMENTAL PERMITS	
A. NPDES (Discharges to Surface Water) D. PS	(Air Emissions from Proposed Sources)
A. NPDES (Discharges to Surface with the state of T)	
N NA 9P	N.A. 100
39 15111	E. OTHER (specify)
B. UIC (Underground Injection of Fluids)	(specify)
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C. RCRA (Hasardous Wastes)	/enecify!
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I. MAP	the sections mile beyond property boundaries. The map must show
Attach to this application a topographic map of the a	rea extending to at least one mile beyond property boundaries. The map must show a existing and proposed intake and discharge structures, each of its hazardous waste
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JOE D. TANNER
Commissioner

J. LEONARD LEDBETTER Division Director

Department of Natural Resources

ENVIRONMENTAL PROTECTION DIVISION 270 WASHINGTON STREET, S W ATLANTA, GEORGIA 30334

August 10, 1983

Ms. Bernadette B. Sorchevich General Motors Corporation Warehousing & Distribution 6060 West Bristol Road Flint, Michigan 48554

RE: Request for Facility Status
Changes for G.M. Parts Division
Plant, Chamblee, EPA
ID# GADOO0814350

Dear Ms. Sorchevich:

This will acknowledge receipt of your request for withdrawal of your application for a Hazardous Waste Facility permit.

Based on the information provided, withdrawal of your application is warranted and your permit application has been placed in our inactive files.

[As requested, your status has been changed to a small quantity generator and your EPA Identification Number has been retained.]

Please be advised that withdrawal of your permit application invalidates any variance that you received to continue existing hazardous waste treatment storage or disposal during the permit review process and that based on our concurrence with your withdrawal request, the Federal Environmental Protection Agency will terminate your facility's interim status.

Should you wish to treat, store, or dispose of hazardous waste in the future, it will be necessary that a hazardous waste handling permit be issued, prior to the construction of such facilities, under authority of Section 8 of the Georgia Hazardous Waste Management Act and paragraphs .10 and .11 of Georgia's Rules for Hazardous Waste Management, Chapter 391-3-11.

If further clarification is needed on this matter, please feel free to contact Alan Laros at 404/656-7802.

Sincerely.

John D. Taylor, Jr., Program Manager

Industrial & Hazardous Waste
Management Program

JDT:AL :dib

cc: James H. Scarbrough

File: GM Parts Div. (Y)- 3149C

THE STAL PROTECTION AGENCY

JUN 0 3 1982

ATLANTA GEORGIA 30365

4AW-RM

Ms. B.B. Sorchevich
Environmental Control
Facilities & Planning
General Motors Parts Division
General Motors Corporation
6060 West Bristol Road
Flint, Michigan 48554

Re: Atlanta-Chamblee Facility - EPA I.D. #GAD000814350

Gentlemen:

This letter is to acknowledge receipt of your request for withdrawal of your application for a permit under the Resource Conservation and Recovery Act (RCRA), as amended. Your letter indicated that you no longer treat, store, or dispose of hazardous waste.

It has been our general experience that the RCRA regulations and the amendments which have been published since May 19, 1980, have caused confusion, and have been subjected to misinterpretation. This confusion on the part of the regulated community has been compounded, due to EPA's and the State's overlapping responsibilities for implementation of the hazardous waste regulatory program during the period of interim authorization.

Withdrawal of your permit application constitutes revocation of interim status, as defined by Section 3005(e) of the Act. Consequently, under the Federal program, you would no longer be allowed to treat, store, or dispose of hazardous waste. However, as you are probably aware, the State has been authorized to implement certain requirements of the program in lieu of the Federal regulatory requirements. Therefore, withdrawal of your applications also directly affects the State program.

In light of the foregoing, EPA plans to proceed as follows. EPA will place your file in our "suspense" file. This action, in essence, revokes your interim status under the Federal program. However, we will forward the request to the State for formal action. The State will contact you it further information relating to your request is required. If the State agrees that your waste is not hazardous, and that you do not need a kCRA permit, the State will notify you of this determination, and by carbon copy of this notification sent to EPA, your application will be formally withdrawn, and your file will be inactivated.

In conclusion, this letter should <u>not</u> be construed as EPA's concurrence with your determination that kCRA regulatory requirements are not applicable to your facility. Furthermore, this letter does not relieve you of your responsibility to comply with State and Local hazardous waste regulatory requirements.

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Finally, your request to withdraw interim status means that you may not treat, store, or dispose of hazardous was e without a permit issued under the authority of §3005 of the Act and 40 CFR 264.

If for any reason you wish to reconsider this withdrawal request, please advise this office and the State within the next ten days. You should be receiving a formal response to your request from the State in the near future. If you require further clarification, please contact John Herrmann of my staff (404) 881-3433 or a representative of the State hazardous waste program.

Sincerely yours,

James H. Scarbrough, Chief Residuals Management Branch

ce: Georgia Department of Natural Resources

4AW-RM McCurry 4AW-RM

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MCCURRY:sjw:WES:x3433:6/1/82

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LEASE ADVISE 000028



Environmental Activities Staff

RECEIVED EPA/REGION IV General Motors Corporation General Motors Technical Center Warren, Michigan 48090

FEB 23 10 58 Am 'b February 20, 1981

ENFORGERERT DIVISION

Mr. Paul Keith RCRA Activities U.S. EPA Region IV 345 Courtland Street, N.E. Atlanta, GA 30365

Dear Mr. Keith:

Attached is a copy of the November 10, 1980 letter issued by the U.S. EPA General Counsel allowing General Managers of General Motors Corporation to sign the permit applications required under the Consolidated Permit program. Although the EPA letter was copied to all EPA Regional Counsels and Enforcement Directors, the attached copy is provided for the convenience of you and other persons in the RCRA Activities group of EPA Region IV.

Should you have any questions, please contact me by calling (313)575-8602.

Very truly yours,

Joseph P. Chu

Senior Staff Engineer

JPC:ear

Attachment

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CA 0008 14350



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

NOV 1 0 1980

OFFICE OF GENERAL COUNSEL

Louis E. Tosi, Esquire Fuller, Henry, Hodge & Snyder 300 Madison Ave., 1200 Edison Plaza Post Office Box 2088 Toledo, Ohio 43603

Dear Mr. Tosi:

This is in response to your November 4 petition on behalf of General Motors Corporation (GM) for relief from certain signatory requirements under the Consolidated Permit regulations. Although GM's request extends to all permits governed by the Consolidated Permit Regulations, the corporation appears to be particularly concerned about meeting those requirements in time to file a RCRA permit application by the November 19, 1980 deadline set forth in EPA's regulations. For the reasons stated below, I believe that correct interpretation and application of the regulations will substantially reduce the burden on GM such that compliance can be attained by the RCRA November 19, 1980 filing deadline. We understand that upon receipt of this letter GM will withdraw its November 4, 1980 petition except as to item 3 on page 1, relating to owners and operators. Further, we agree that withdrawal of the petition will not prejudice any rights GM has to continue litigation or file additional petitions.

On May 19, 1980, EPA issued final Consolidated Permit regulations. 40 CFR Parts 122, 123 124 and 125 (45 FR 33290). Section 122.6 of these rules requires corporate permit applications to be signed "by a principal executive officer of at least the level of vice president." The section also requires a particular form of certification by the signer.

After publication of these rules, representatives of chemical and other industries requested clarification of some of the key terms of the signatory requirements of §122.6. In response, EPA published in the August 8, 1980 Federal Register a policy statement explaining the Agency's interpretation of the regulation. 45 FR 52149. The policy statement stressed, among other things, that the requirement for a vice president to sign would be interpreted to include officials with other titles but similar "policy-making functions." It further stated that the level of inquiry required by the form of certification would generally be construed to mean a "good faith effort"



to ascertain whether the submitted information meets applicable requirements.

On November 3, 1980, you sent to EPA a petition on behalf of GM asking for relief from the signatory and certification requirements in Section 122.6. GM stated that it must file 235 RCRA interim status applications by November 19, 1980. Moreover, GM has 73 plants with NPDES permits, although not all these permits require applications for renewal at the same time. GM had identified only six or seven corporate officials who would clearly be authorized to sign all these applications. Contending that the number of applications and the level of burden is unduly high, GM asked EPA either to advise that plant managers can sign the applications, or to suspend or amend the regulations to relieve the claimed burden on the corporation.

GM argued that the signatory requirement places an unnecessary burden on vice presidents because it requires of them a level of inquiry impossible for anyone above the plant manager level. Thus, it contended, the regulations require the vice president to read not only the application, but also all attachments to the applications, which may run to hundreds of pages. They must also, GM said, have a working knowledge of analytical methods, general engineering and chemical principles, and each plant's detailed processes and facility layout. According to GM, virtually all signers would need to be "skilled in environmental science," have "daily contact with the plant," and make inquiries of every person in the plant who had anything to do with gathering information for the application.

On November 6, you and Mr. Leonard Charla of GM met with representatives of my office and the Office of Enforcement to discuss your petition. Based on information presented in your petition, and orally at the meeting, I believe GM's misreading of the regulations caused it to overstate its difficulties in compliance.

First, GM's corporate structure allows the burden to be spread more than you assumed. GM is divided into 39 operating divisions, 28 of which are headed by officers who are vice presidents of General Motors Corporation. Mr. Charla stated that those divisional managers who are not vice presidents have equivalent responsibilities within their divisions to



the divisional managers who are designated vice presidents.

Because their functions are the same, those officers are "at least the level of vice president," and are accordingly authorized to sign permit applications.

Moreover, EPA's regulation, as interpreted in the August 6, 1980 policy statement, was not intended to require vice presidents to acquire the technical expertise of plant engineers or environmental scientists. Like any manager, a vice president must rely upon subordinates to establish the system of checks and cross-checks that will enable him or her to sign with assurance that the information is complete and correct. As the certification indicates, the vice president must examine the application. EPA does not expect high corporate officials to wade through multi-volume modeling studies for PSD permits or lengthy attachments to permit applications consisting of raw data, although they should understand what these documents contain, why they are being provided, and how they will be used. Having examined the application, the vice president must then assure its accuracy and completeness. A corporate official is not expected then to have the technical expertise to parse every line on the form, nor to take the time to cross-examine the scores of employees that may have participated in its preparation.

Instead, as is stated in the preamble to the 1979 NPDES regulations in which the signatory requirement first appeared, "the signatory may rely on the representations of the person immediately responsible for obtaining the information in the document when certifying to its accuracy, etc." 44 Fed. Reg. 32860 (June 7, 1979). The person "immediately responsible" is not, as your petition assumes, the person who performs the sampling.

We expect in most cases that a plant manager or plant or corporate environmental supervisor will supervise collection of the information. Vice presidents are entitled to rely upon such persons in making inquiries regarding the accuracy of information. As the policy statement indicates, only if inquiry of these individuals fails to provide a reasonable basis to assure the accuracy and completeness of the information is further inquiry necessary.



As to the problem identified on p. 1, Item 3 of your petition, EPA recognizes that some operators of RCRA facilities have encountered difficulties in securing appropriate signatures and certifications from owners. In such cases, EPA advises operators to submit the application, in compliance with such of the signatory and certification requirements as apply to operators, and an explanation of the steps the operator has taken to secure the owner's compliance.

Please let me know if you need further assistance.

Sincerely

Michele Beigel Corash

General Counsel

cc: Service List

Consolidated Permits Litigation

Regional Counsel

Regional Enforcement Division Directors



May 13, 1982

EPA Region IV 345 Courtland Street Atlanta, Georgia 30365

Attention: Ms. Rita Ford

RE: EPA #GAD000814350 - Atlanta, Chamblee

Dear Ms. Ford:

Enclosed, please find a revised copy of page 3 of 5 of the Part A RCRA application. At this time we are requesting deletion of the original listed wastes and quantities. These wastes were originally listed due to a misunderstanding of the regulations.

General Motors Warehousing and Distribution Division hereby requests that the status of the above referenced facility be changed from full TSDF to Small Quantity Generator. In addition, we request that we retain our EPA ID number for future use should the nature of our operations change.

If I can be of further assistance, please contact me at 313-635-6614.

Sincerely,

B. B. SORCHEVICH

Environmental Control

Facilities and Planning

BBS/sm Enclosure Continued from page 2. NOTE: Photocopy this page before completing if you have more than 26 wastes to list. Form Approved OMB No. 158-S80004 EPA I.D. NUMBER (enter from page 1) FOR OFFICIAL USE ONLY WLI W DUP DUP IV. DESCRIPTION OF HAZARDOUS WASTES (continued) M. EPA HAZARD. ZO WASTENO JZ (enter code) C.UNIT OF MEA-SURE (enter code) D. PROCESSES B. ESTIMATED ANNUAL QUANTITY OF WASTE 1. PROCESS CODES (enter) 2. PROCESS DESCRIPTION (if a code is not entered in D(1)) А 0001 301 22000 2 D002 Incl. Above 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 Ž, 23 entities of the contract of 24 25 26 GA 000814350

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SUPPLEMENTARY DETAIL TO SECTION C - COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES

The commercial chemical products identified by the code numbers listed in Section C (as listed in Subpart D, Section 261.33) are not, by generic name, purchased, manufactured, or used in formulating any other commercial chemical product by General Motors Parts Division. However, these chemicals are known to be present in various proportions in some of our distributable products which have been or may be handled by General Motors Parts Division in the course of our business and which have been or may become subject to storage and/or disposal.

If you have any questions or comments concerning this matter, please notify the installation contact shown in Section IV of the form.

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NOT

February 24, 1981

U.S. Environmental Protection AGency Region IV RCRA Activities 345 Courtland St., N.E. Atlanta, Georgia 30365

Dear Sir:

Enclosed please find the RCRA permit application forms for the following facilities:

EPA ID #: KYD 068335231

Location: 4501 Indian Trail, Louisville, KY

EPA ID #: FLD 079200978

Location: 8206 Phillips Hwy., Jacksonville, Florida

EPA ID # GAD 000814350 Location: 5373 Peachtree Ind. Blvd., Chamblee, GA

We are currently attempting to obtain the owner's signatures on these forms. This matter could take a considerable amount of time as most of these facilities are owned by investment companies, trust companies, or other large firms. In reference to this matter, I refer you to page 4 of the attached letter from U.S. EPA's General Counsel.

When these signatures are obtained or if we are unable to accomplish same, we will forward the forms or a detailed explanation to your office.

Sincerely,

W. K. DAWSON, Sr. Engineer Environmental Control

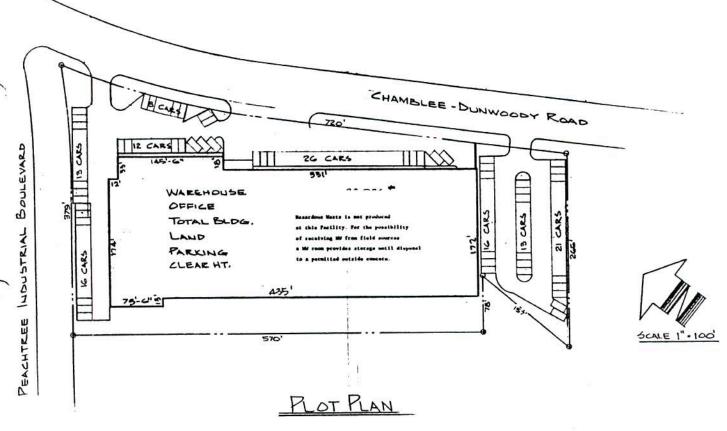
GM Warehousing & Distribution Division

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G.M.T. & C. - ATLANTA, GEORGIA

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(FORM 2A)	- -	17	- 10	aquetic animal production discharge to weters of the	on facility which require in a	1	X	
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and the second s	-			- teining, within one que	rier mile of the well bore, rinking water? (FORM 4)		X	
Do you or will you inject at this facility any produc water or other fluids which are brought to the surfe	ed.			H. Do you or will you inject	at this facility fields for me	34	17	
in connection with conventional oil or natural gas p	ro-	×		CIEL DIOCESSES SUCT AS IN	ning of sulfur by the Frasch of minerals, in situ combus-		_	
ou or natural gas, or inject fluids for storage of liqu hydrocarbons? (FORM 4)	rid			(FORM 4)	DMITY of centhermal energy?		×	
is this facility a proposed stationary source which one of the 28 inclustrial extensions listed in the	15	. 34	- 14	J. is this facility a propose	stationary anuma which is	17:	39"	702
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IV DESCRIP	TION OF	HAZARDOUS	WASTES

- A. EPA HAZARDOUS WASTE NUMBER Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE	METRIC UNIT OF MEASURE CODE
POUNDS	KILOGRAMS
TONS	METRIC TONS

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code/s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- 1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual
- quantity of the waste and describing all the processes to be used to treat, store, and or dispose of the waste.

 In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- 3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

A EPA		C. UNIT	D. PI	ROCESSES
HAZARD.	B. ESTIMATED ANNUAL QUANTITY OF WASTE	sure (enter code)	1. PROCESS CODES (enter)	2 PROCESS DESCRIPTION (if a code is not entered in D(1))
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X-2 D 0 0 2	400	P	T 0 3 D 8 0	
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) Form Approved OMB No. 158-520-704

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2	U	0	5	4								Incl. Above		
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9	U	1	5	4								Incl. Above		
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V. FACILITY DRAWING					× 21947534	Saude Held	
All existing facilities must include in the space provided on pag VI. PHOTOGRAPHS	e 5 a scale drawing of the		0.52/1-0.004/0.004/0.05/0.05/0.05/0.05	Statisticalities	10.000	Cio de Service	20
All existing facilities must include photographs (aerial of treatment and disposal areas; and sites of future storage	o <i>r grouno—level)</i> that e, treatment or dispos	clearly delineate all e al areas (see instruction	existing str	uctures ere detai	; existing st	torage,	
VII. FACILITY GEOGRAPHIC LOCATION LATITUDE (degrees, minutes, & seconds)	الدائدوقا ريو والوائدوند العار	A STATE OF THE STA			& seconds)	Service Control	
3 3 3 45 4 4 6		20001101	04/	Coll	a seconds)		
VIII. FACILITY OWNER		72	14 75	70 77			
VIII. FACILITY OWNER A. If the facility owner is also the facility operator as liste	ed in Section VIII on East				PROPERTY AND		
skip to Section IX below.	a in Section viti on Fon	m r, General Informat	ion , prace a	ın X II	n the oox to	the left and	
B. If the facility owner is not the facility operator as listed	d in Section VIII on Forr	n 1, complete the follo	wing items:				
1. NAME OF FACILITY	Y'S LEGAL OWNER			2. PI	10NE NO. (area code & no.	.)
N. Y. LIFE INSURANCE CO	,					411	
3. STREET OR P.O. BOX	4.0	NWOT RO YTE		. ST.	5. ZII	PCODE	-13
51 MADISON AVE	GNEW	YORK	٨	14	100	10	
IX. OWNER CERTIFICATION	4	A	io i			and the same	
I certify under penalty of law that I have personally exa documents, and that based on my inquiry of those indi- submitted information is true, accurate, and complete, including the possibility of fine and imprisonment.	viduals immediately re	or with the information	on submitt	ed in th	nis and all au	that the	6
A. NAME (print or type)	SIGNATURE			C. DATE	SIGNED	PERMITS PARTIES AND ADDRESS OF THE PERMITS AND A	
X, OPERATOR CERTIFICATION	A TO IN THE PROPERTY OF THE PARTY.	and the second second	A CONTRACTOR	Tr. w. 4. 50	1242.4376		
I certify under penalty of law that I have personally exa documents, and that based on my inquiry of those indi- submitted information is true, accurate, and complete, including the possibility of fine and imprisonment.	amined and am familia viduals immediately re	or with the information	on submitt	ed in th	nis and all at	ttached	Line
	SIGNATURE	1 //		C. DATE	SIGNED.		-
L.G. KALUSH	为海河	elush		11/	17/8	21	
PA Form 3510-3 (6-80)	PAGE 4 OF	5			CONTI	NUE ON PAGE	ć 5
*							

IV JESCRIPTION OF HAZARDOUS WASTES (continued)

U. USE THIS SPACE TO LIST ADDITITY OF PROCESS CODES FROM ITEM D(1) ON JE 3.



General Motors Parts Division General Motors Corporation

November 18, 1980

To: E.P.A. Regional Offices

Dear Sirs:

This is a leased facility. We are attempting contact with the owners for proper owner signature.

Due to the time constraint, we are submitting this application with the signature of our General Manager who is the principal operating officer of General Motors Parts Division.

As soon as the proper owner signature becomes available, we will forward same to the Environmental Protection Agency regional office involved.

We trust that the submittal of this application signifies to the E.P.A., General Motors Parts Division's intent to comply with the law.

Sincerely.

W. A. Ellis

Administrator

Environmental Control

WAE/e

00C307 NOT

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Part A. Permit Process --- Internal Checklist

ID Number	\$1000814350 Inst Name Sinc (LAH)	1 DIST OU	ř.
Refer to	PHASE ONE	5 TO THE STATE OF	Valid Prmlg
om Mo:	Interim Regulatory Requirements		Qate?
1	T/S/D'Facility? (If No, return to respondent.)		
3	Form 1 received?	<u> </u>	
1	Form 3 received?	<u> </u>	
1 & 3	Postmarked on or before November 19, 1980?	16	
3	Sate of operation entered?	45	
3	Date of operation on or before November 19, 1980?	<u> </u>	
Notif. record	Notifier?	11	28
n	Notified on or before August 18, 1980?	łk	
1	Form 1, XIII B signed?	LK	
3	Form 3, IX B Signed?	_ \	Ti i
(If all ter Acknowledge	n items above are initialed in the Yes column, generatement and indicate the trigger date here:	te Interim Status	
	PHASE TWO	-	
1	Unsure if regulated or non-regulated?		
3 .	New facility?		
1 & 3	Core items missing? If Yes, indicate which items:	940(1940)	
	Facility name; location; mail address; oper	ator info;	
	certification; process info; waste info; ow	mer; sigs	
	PHASE THREE		
1 4 3	Mon-core items missing? If Yes, indicate which item	s:	
	Maps : photos ; drawings ; lat/long .		
	Other observations and comments:		
		Received Date Stamp	<u> </u>

GA O 0

NOT GA 0 0 0 8 1 4 3 5 0

RCRA MAINTENANCE FORM

ID :	#	FACILITY NAME	1 11 1 1	1 8 8 VII 8
	Facility name Notif. confidential Part A confidential Closure date			
F2	Contact name & title Contact telephone # Modif. under const. Commercial fac. indic. Non-reg. fac. indic.			
F3	Mailing address			
F4	Mailing city		_ State	Zip
F5 *	Facility address			-
F6 * *	County code Drawings PhotoRiver basin code	os j Distr	rict code	Zip
F7	SIC NEW S			
	Facility operator name Activity codes: Gen Transport mode: Air Owner/oper ind. Existance date	Trans TSD 16 Rail Hwy Facility status	_ UIC O	therermit status
F9 .	Type Permit number	Type New permit r		a 2

* This data can only be entered through the FINDS System. *

000302

NOT

FO	Date ack Int. sta	nowledg	gement sent:	Notifi Int. s	cation	on		
PA	Operator	tele.	#			Street		
FB	City			State		Zip	Indian la	nd
FC	Comment	#	Comment					
FE	Facility	owner					Tele.#	
FF	Owner st	reet						
FG	Owner ci	.ty				State	Zip	
Cl	Process		Amount			New code	New Amount	
Wl	seq #		Waste Amount				New Amount	
W2	Waste Seq #	Waste Code	Process	Chang Proce				

Releasable Leonard Dangerfield

a 4/69 Date

65: Reviewed 1/9/85 Cfswarren

COVER SHEET: General Motors Parts Division - Doraville GAD000814343

The General Motors Parts Division - Doraville facility is located at 4060 Motors Industrial Way, Doraville, GA 30360. It is an active auto parts and accessories warehouse and distribution faciltiy that has been owned and operated since opening in 1973 by the GMC Warehousing and Distribution Division of Flint, Michigan, 6060 W. Bristol Road, Flint, Michigan 48554. This facility notified in 1980 and submitted a Part A (Attachment I). At a later date, after clarification of definitions and a modification of plant operations, this facility requested and received a change in status to a Small Quantity Generator (Attachments 4&5). A conversation with Mr. Al Avery, Plant Engineer, revealed that no waste disposal has occured. All wastes generated at the site are removed by Arivec Chemicals, Inc. (Attachments 2&3). No further action is required at this facility.

MA/mcw015

POOR LEGIBILITY

ONE OR MORE PAGES IN THIS DOCUMENT ARE DIFFICULT TO READ DUE TO THE QUALITY OF THE ORIGINAL

	Si		

POTENTIAL HAZARDOUS WASTE SITE

I. IDENTIFICATION

PA	PRELIMINAF ART 1 - SITE INFORM	RY ASSE	SSMENT ND ASSESSI		A DOO	ENUMBER 081434:	3
II. SITE NAME AND LOCATION							
01 SITE NAME (Legal, common, or descriptive name of site)		02 STRE	ET, ROUTE NO., C	OR SPECIFIC LOCATION IDENT	TEIER		
General Motors Part Div	deien D	1					
GOINT HOLOIS FAIL DIV	ision-Doravil		60 Motor	s Industrial Wa	ay		
343		04 STATE	05 ZIP CODE	06 COUNTY		07COUNTY	
Atlanta		GA	30360	Dekalb	- 1	O44	DIS.
9 COORDINATES LATITUDE	LONGITUDE			Locato		044	
33° 54' 40.0" 084°					9		
D DIRECTIONS TO SITE (Starting from nearest public road)	_17'_13.0."_			75			
From downtown Atlanta p tree Industrial Blvd., approximately kmi. & tu I. RESPONSIBLE PARTIES mately 1/2	rn left onto	left Motors	(south).	Proceed on Pea	achtre	Indus	+++
General Motors Corporat	ion Warehaous	1 DO STREE	T (Business, mailing,	residential)			
and Distribution Divisi	on - Flint	-1.9	50 tr 5				
эспу	OH - FIINT	600	05 ZIP CODE	stol Road			
77 · ·		U4 STATE	US ZIP CODE	06 TELEPHONE NUMBE	ER	Master March	
Flint		MI	48554	(313)635-547	74		
7 OPERATOR (If known and different from owner)			T (Business, mailing,				
CITY		La company					
		10 STATE	11 ZIP CODE	12 TELEPHONE NUMBE	R		-
*		t		()	88		
TYPE OF OWNERSHIP (Check one)							
Æ A. PRIVATE □ B. FEDERAL:	560						
	(Agency name)		. C. STAT	E DD.COUNTY D	E. MUNICIP	AL	
TI E OTHER:		15	G. UNK	NOWN			
OWNER OPERATOR NOTIFICATION ON FILE (Check all that at	Specify)			TOWN			
MA BCBA 2004 DATE OF OFFICE 3 3 3 3 2 0	oply)						
₩ A. RCRA 3001 DATE RECEIVED: 11 13 84	B. UNCONTROL	LED WASTE	SITE (CERCLA 10	DATE RECEIVED:		D C. N	ONE
CHARACTERIZATION OF POTENTIAL HAZA	47)			MON	ITH DAY YEA	UR CONTRACT	
ON SITE INSPECTION	Y (Check all that apply)						
		A CONTRAC	TOP O	C 57475			
MONTH DAY YEAR	E. LOCAL HEALTH OFF	ICIAI [F OTHER	C. STATE D. OT	THER CONT	RACTOR	
			r.omen	(Specuy)			
SITE STATUS (Check one)	ONTRACTOR NAME(S):						
	- 03 YEARS OF OPE	RATION					-
13 A. ACTIVE B. INACTIVE C. UNKNOWN	N /	1973/	Pres	ent 🗆 unki	MOMM		
DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNO		BEGINNING YEA	R ENDING		NOWN		
TOTAL SUBSTANCES POSSIBLY PRESENT, KNO	OWN, OR ALLEGED	1	- 4				
57							
Variety of solvents and	other organic	and i	norganic	chemicals sto	red at	facil	itv
			ver a constant	•			
DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT	AND/OR POPULATION						
NONE							
· · · · · · · · · · · · · · · · · · ·							
PRIORITY ASSESSMENT							
				37		/	
PRIORITY FOR INSPECTION (Check one. If high or medium is check L. A. HIGH	ked, complete Part 2 · Waste Infor	mation and Part	- Description of Haz	erdous Conditions and Incidents)		7	-
CO. WILDIOM	L C. LOW		X D. NONE			VATA	W
	ed) (Inspect on time	avadable basis)	(No furt)	er action needed, complete current o	disposition form	, C/O,	191
INFORMATION AVAILABLE FROM							111
CONTACT	02 OF (Agency Organize	Inoit			100 ===	EDHOME	1055
W 27 2					O3 TEL	EPHONE NU	MBER
Mr. Al Avery PERSON RESPONSIBLE FOR ASSESSMENT	Plant En	gineer	, GM Par	ts - Doraville	404	1454-53	307
ASSESSMENT	05 AGENCY	06 ORGAN	IZATION	07 TELEPHONE NUMBER			
Mike Allred	DNR-EPD	Rem	edial			-	
E001/2070 12/7	DIKK-EPU	Lactio	ns Ilnit	404 656-740	J4 -MC	WITH DAY YE	AR

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		A LANGE
W	-	

POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT PART 2 - WASTE INFORMATION

I. IDENTIFICATION

01 STATE | 02 SITE NUMBER

GA D000814343

II. WASTEST	ATES, QUANTITIES, AN	ID CHARACTERIS	STICS						
	ATES (Check all that apply)	02 WASTE QUANTIT		03 WASTE CHARACTE	ERISTICS (Check all that	apply)			
DI A. SCLID DI B. PCWDER, FINES SC. F. LIQUID DI C. SLUDGE DI G. GAS CUBIC YARDS			M A TOXIC DE SOLUBLE DI HIGHL M B CORROSIVE DE INFECTIOUS DI J. EXPLC C. RADIOACTIVE G. FLAMMABLE DE L. INFODI L. INFODI M. NOT		REACTIV INCOMP	VE /E ATIBLE			
4	(Specify)	NO. OF DRUMS _							
III. WASTE T	YPE								
CATEGORY	SUBSTANCE	NAME	01 GROSS AMOUNT	02 UNIT OF MEASURE	03 COMMENTS				
SLU	SLUDGE	,							
OLW.	OILY WASTE	+/	0.33	MT	Amount Go	en. in '83	B. Av	a. is	55kg
SOL .	SOLVENTS		5.36	MT		en. in '83			
PSD :	PESTICIDES				1				
occ,	OTHER ORGANIC C	HEMICALS							
IOC .	INORGANIC CHEMIC	CALS							
ACD;	ACIDS								
BAS:	BASES					+			
MES.	HEAVY METALS					177			
IV. HAZARD	OUS SUBSTANCES (See	Appendix for most frequent	lly cited CAS Numbers)						
01 CATEGORY	02 SUBSTANCE		03 CAS NUMBER	04 STORAGE/DISE	POSAL METHOD	05 CONCENTE	RATION	06 MEASI CONCENT	URE OF
SOL	Acetone			Drum Stora	age			CONCENT	MATION
SOL:	Cyclohexanon	e		Drum Storage					
SOL	Dichlorobenz		25321-22-6				 		
SOL	Dichlorodifl			Drum Stora		+		-	
SOL	Dechlorometh			Drum Stora					
SOL	Ethylacetate			Drum Stora					-
occ:	Formaldehyde		50-00-0	Drum Store				<u> </u>	
SOL	Methanol		20 00 0	Drum Store					
SOL	Methyl Ethyl	Ketone		Drum Store				-	
SOL	Methyl Ethyl		roxide	Drum Store				1	
SOL	Methyl Isobu		Oniuc	Drum Storage					
	Tetrachloroe							 	
OCC.	Toluene Diis			Drum Store	and-			-	-
SOL	Trichloroeth		25323-89-	Drum Stora	age	-		-	
DOD,	1110110106011	ane	23323-09-	 				-	
								-	
·				1					
	OCKS (See Appendix for CAS Num		T	Т					
CATEGORY	01 FEEDSTO	CK NAME	02 CAS NUMBER	CATEGORY	01 FEEDS	STOCK NAME		02 CAS N	UMBER
FDS	Toluene		108-88-3	FDS					
FDS	Xylene		1330-20-7	FDS					
Fbs				FDS					
FDS				FDS					Samuel
VI SOURCE	S OF INFORMATION (C)	te specific references, e g.	, state files, sample analysis.	reports)					

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POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT

1. IDENTIFICATION

01 STATE 02 SITE NUMBER

GA D000814343

HAZARDOUS CONDITIONS AND INCIDENTS			
21. A. GROUNDWATER CONTAMINATION 23 POPULATION POTENTIALLY AFFECTED:	02 OBSERVED (DATE:04 NARRATIVE DESCRIPTION) DOTENTIA	L ALLEGED
DB. SURFACE WATER CONTAMINATION POPULATION POTENTIALLY AFFECTED:	02 OBSERVED (DATE:) DOTENTIA	L 🗆 ALLEGED
3 2			
C. CONTAMINATION OF AIR POPULATION POTENTIALLY AFFECTED:	02 ☐ OBSERVED (DATE:) [] POTENTIAL	. 🗆 ALLEGED
TOTAL APPECIED.	04 NARRATIVE DESCRIPTION	9	- S ALLEGED
D. FIRE/EXPLOSIVE CONDITIONS	02 ☐ ÖBSERVED (DATE:	\ Description	D. W. Eben
D. FIRE/EXPLOSIVE CONDITIONS POPULATION POTENTIALLY AFFECTED:		CI POTENTIAL	□ ALLEGED
* 1			
C E. DIRECT CONTACT POPULATION POTENTIALLY AFFECTED:	02 D OBSERVED (DATE:) D POTENTIAL	□ ALLEGED
	04 NARRATIVE DESCRIPTION		
5) 50 # # # # # # # # # # # # # # # # # # #			
F. CONTAMINATION OF SOIL AREA POTENTIALLY AFFECTED: [Acres]	02 OBSERVED (DATE:) □ POTENTIAL	☐ ALLEGED
G. DRINKING WATER CONTAMINATION OPULATION POTENTIALLY AFFECTED:	02 OBSERVED (DATE:	_) □ POTENTIAL	□ ALLEGED
H. WORKER EXPOSURE/INJURY			
YORKERS POTENTIALLY AFFECTED:	02 OBSERVED (DATE:	_) D POTENTIAL	□ ALLEGED
s			
I. POPULATION EXPOSURE/INJURY PULATION POTENTIALLY AFFECTED:	02 [] OBSERVED (DATE:	_) DOTENTIAL	□ ALLEGED
DESCRIPTION APPECIED:	C4 NARRATIVE DESCRIPTION		D. ACCEDED
ä			

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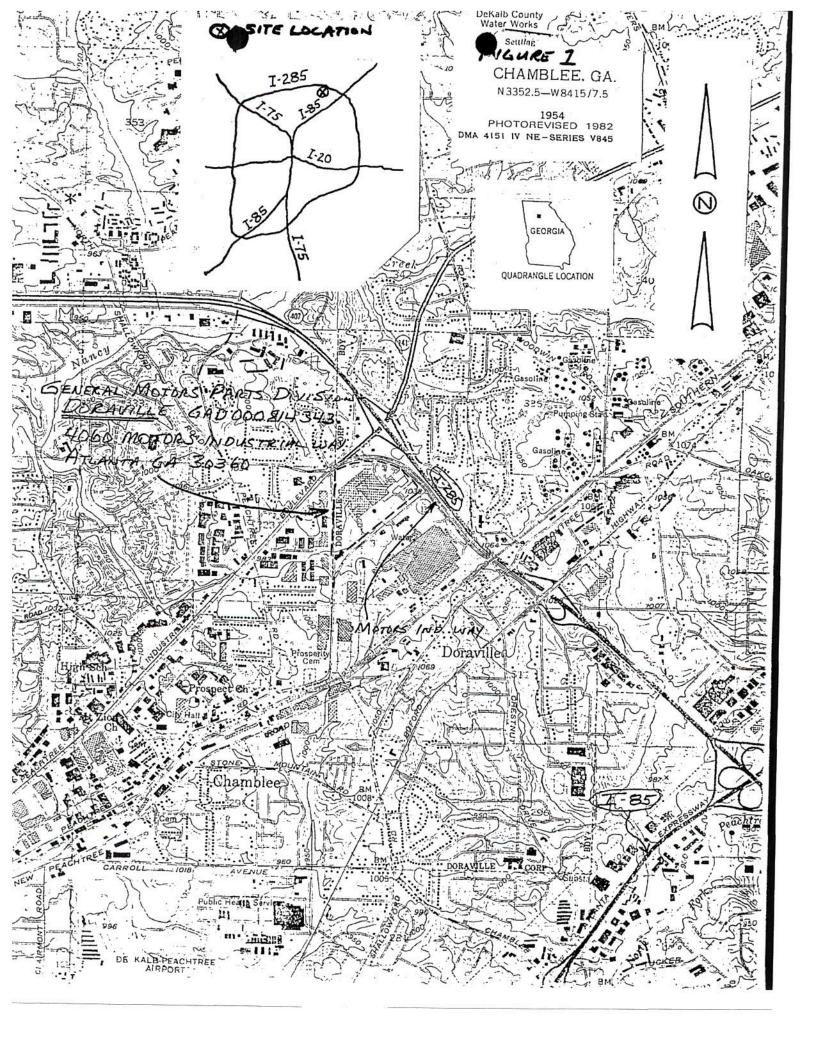
POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENT

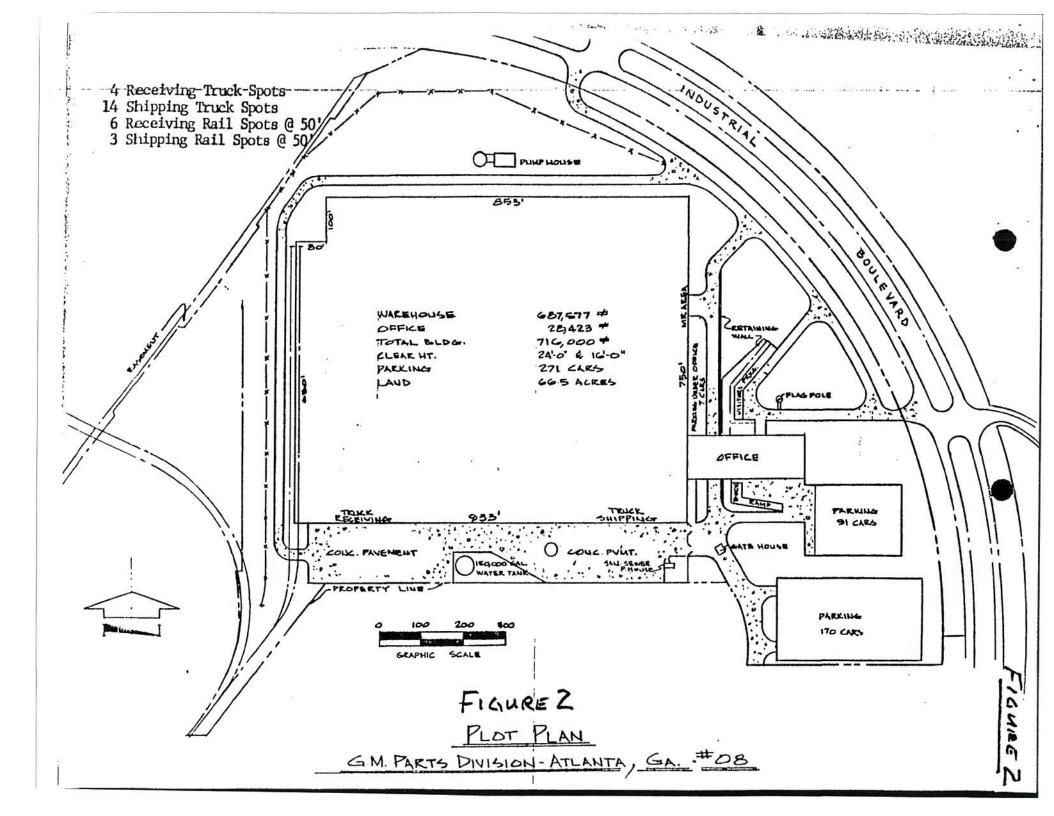
I. IDENTIFICATION

01 STATE 02 SITE NUMBER

GA DOOOS 1434

PART 3 - DESCRIPTION OF HAZ	ZARDOUS CONDITIONS AND INCIDENTS	GA DO	000814343
II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)			
01 □ J.'DAMAGE TO FLORA 04 NARRATIVE DESCRIPTION	02 🗆 OBSERVED (DATE:)	☐ POTENTIAL	□ ALLEGED
01 ☐ K. DAMAGE TO FAUNA 04 NARRATIVE DESCRIPTION (Include name(s) of species)	02 🗆 OBSERVED (DATE:)	□ POTENTIAL	☐ ALLEGED
01 □ L. CONTAMINATION OF FOOD CHAIN 04 NARRATIVE DESCRIPTION	02 □ OBSERVED (DATE:)	POTENTIAL	□ ALLEGED
01 ☐ M UNSTABLE CONTAINMENT OF WASTES (Spills/runoff/standing liquids/leaking drums) 03 POPULATION POTENTIALLY AFFECTED:	02 OBSERVED (DATE:) 04 NARRATIVE DESCRIPTION	POTENTIAL	☐ ALLEGED
01 □ N DAMAGE TO OFFSITE PROPERTY 04 NARRATIVE DESCRIPTION	02 🗆 OBSERVED (DATE:)	□ POTENTIAL	☐ ALLEGED
			• ₂₀
01 D CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs 04 NARRATIVE DESCRIPTION	02 OBSERVED (DATE:)	☐ POTENTIAL	☐ ALLEGED
01 □ P. ILLEGAL/UNAUTHORIZED DUMPING 04 NARRATIVE DESCRIPTION	02 OBSERVED (DATE:)	☐ POTENTIAL	□ ALLEGED
05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEG	ED HAZARDS		W. The state of th
		*	=
III. TOTAL POPULATION POTENTIALLY AFFECTED:	3 (4)		
IV. COMMENTS			
W could be considered as a second considered			
V. SOURCES OF INFORMATION (Cité specific references, e.g., state files, s	emple analysis, reports)		





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Warehousing & Distribution Division of General Motors Corporation

November 11, 1983

RECEIVED

NOV 18 1983

Georgia Department of Natural Resources Environmental Protection Division 270 Washington Street, S.W. Atlanta, GA 30334

ENVIRONMENTAL PROTECTION DIVISION LAND PROTECTION BRANCH

3. Sorchwich

RE: EPA #GAD000814343 - Doraville

Changes of Status to Small Quantity Generator

Dear Mr. Laros:

Enclosed, please find a revised copy of page 3 of 5 of the Part A RCRA application. At this time we are requesting deletion of the original listed wastes and quantiites. These wastes were originally listed due to a misunderstanding of the regulations.

General Motors Warehousing and Distribution Division hereby requests that the status of the above referenced facility be changed from full TSDF to Small Quantity Generator. In addition, we request that we retain our EPA TD number for future use should the nature of our operations change.

If I can be of further assistance, please contact me at 313-635-6614.

Sincerely,

B. B. SORCHECICH

Environmental Control Facilities and Planning

BBS/sm Enclsoure

5060 West Bristol Road Flint Michigan 48554

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NOTE	Photocopy t	his page before completing if you	u have r	nore	than A	157eA	HME	WT I	1814 20 E 9 No 158.580004
1	ADCO	ABER (enter from the 1)	//	/	w.		DUP	AL USE	TIPE DUP
IV.		ON OF HAZARDOUS WAST							0000-6
LINE NO.	A. EPA HAZARD. WASTENO	B. ESTIMATED ANNUAL QUANTITY OF WASTE	1 30	REA-			CESS COD		D. PROCESSES
Jž	(enter code)		coc	ie)	27 - 19	(enter)	10 27 - 29	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	DOOL	22000	I		501				
2	DOOR						1,	' '	Incl. Above
3			П						
4							1	+	
5			$\dagger \dagger$	H			1	+	
6			11	П	1-1		1	1	
7			$\dagger \dagger$	П	- 1		1	1	
8			11			17	1	1	
9			\prod	П	-			1	
10				П			1.		10
11			\sqcap		7 1	11	1	1	
12			Π	П	-	1	1	1	
13					77		1	1	
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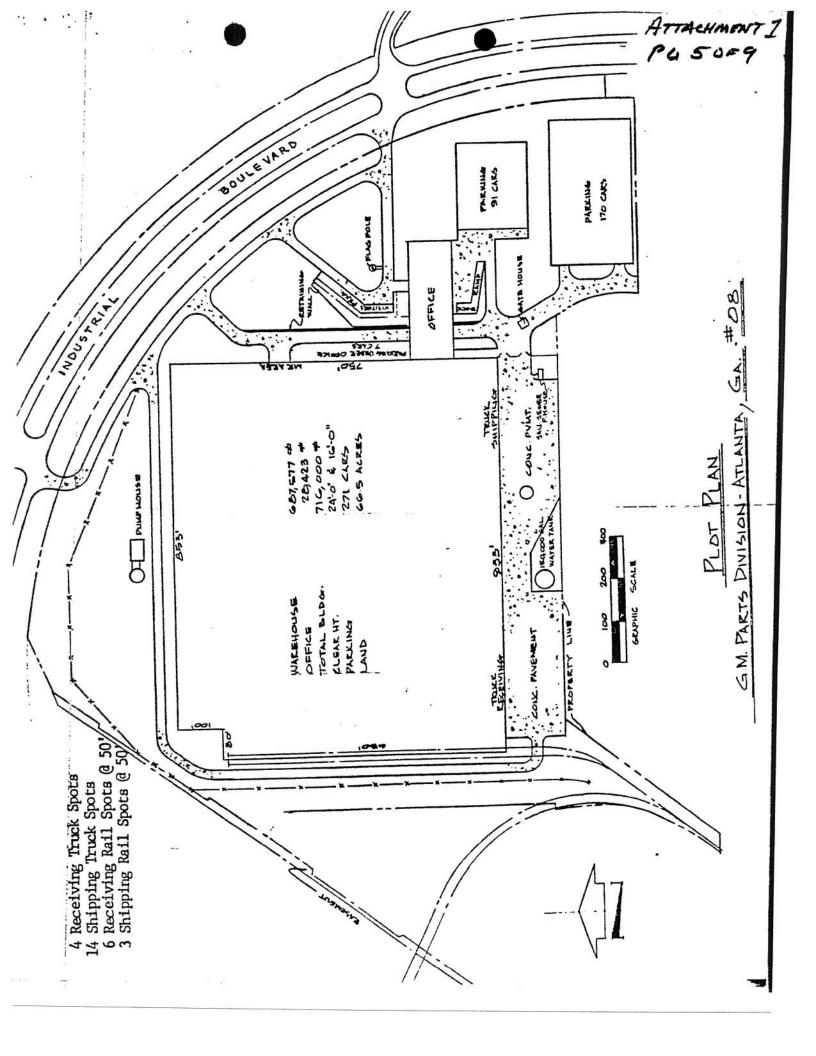
	S.EDV		GENE	RAL		RMATION -	I. EPA I.D. NUMBER	NYO.
GENERAL	VLIF	The state of the s	cod the "Ge	en/Lites	ad Damie	- On-	F 6 A D 0 0 0 81	4
L ITA LD.	111			NA.	NAME OF STREET	HITHIS SPACE	If a preprinted label has be it in the designated space, ation carefully; if any of it through it and enter the appropriate fill—in area being the preprinted deta is abserted of the label space list that should appear), please proper fill—in area(s) below	Revise to la la correction. Il contraction to the correction to th
	NT CHARACTERI						items I, III, V, and VI (a mast be completed reperting the instructions for detail tions and for the legel au which this details collected.	need Sezzi, provided in thoriz
. It the suppled	neutal force is sen	school Human	MW		ut u	se her enmertr innakklik mit	ation forms to the EPA. If you arm question, Mark "X" in the box in t these forms. You may answer "no" tions for definitions of beld-faced.	he thi
V 245 CENTER	SPECIFIC QUE	STICKE	- A	*	PORM	SPECIF	COVESTIONS	-
G. Le this a fr		comment treatment to waters of the	- 1187	X	18:	aquetie animal produ	ity feither existing or proposed of animal feeding operation or ction facility which results in a the U.S.? (FORM 2B)	
A or B sho	WET (FORM 201)	then these descri	ibed in	X		waters of the U.S.? (F	ility (other than those described ich will result in a discharge to ORM 2D) ect at this facility industrial orliow the lowermost stratum con-	13:
G_ Do you or	well you street at the fluids which a	the facility any pro	surfece:		X	underground sources of the Do you or will you lo	defining water? (FORM 4)	3
hydrocarbo	ms? (FORM 4)-	attempt source w	liquidi Pictor is	X		tion of fosilify a property of the facility a property of the facility a property of the facility as property of the facility	recovery of gaothermal energy?	15-1
Clear Air	Act and may affi area? (FORM'S)	stantially unit 100 int regulated unde ict on be located	ar ther		- 12 (m)	instructions and which per year of any air poli Air Act and may affect area? (FORM 5)	ndustrial catagories listed in the will potentially emit 250 tone utent regulated under the Claemat or be located in an attainment.	13
FACILITYC	CHTACT	· & DIS	TRIE	8.1	DLV	ATCANT	Δ	
2 WAD	WAY		·ENG			e i i i i i	E PHONE (area code & ma.)	
FACILITY MA	AILING ADDRESS		8 3 Y 2	* 4	V. 15.50	4 4	10 0 0 0 T T T	4.51
6060	W.BRI		RD.	~~	****			が記
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4060	MOTO P	S / NO	USTK	ne io	ENTIFIE	VAV		
er Seri i Lippiner		SUPTY HAME		****	•			
KALI		TTY OR TOWN			7,77	DISTATE EZIPCO	DE P. COUNTY CODE 1	-

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CONTINUED FROM THE FRONT	HITTACOMENT I PO 40F9
VII. SIC CODES (4-digit, in order of priority)	
A. FIRST	
[specify]	S. SECOND
7 5 01 3 STORAGE - AUTO PARTS	[7]
1111 - 111	11/16 - 19
C. MIND	D. FOURTH
7	(specify)
19 16 - 19	0 0 0 0
VIII. OPERATOR INFORMATION	
A. NAME	B. Is the name listed in
GWA VIICO ODI CTOLO TO	Div File T Owner?
8 GMC WHSG. &DISTRIBUTION	DIV. FLIMI
· · · · · · · · · · · · · · · · · · ·	YES □ NO
C. STATUS OF OPERATOR (Enter the appropriate letter into the ans	
F = FEDERAL . M = PUBLIC (other than federal or state)	(specify)
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E. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "TO4"). FOR EACH PROCESS ENTERED HERE

ATTACHMENT I PG 70F9

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IV.	DESCR	IPTION	OF HAZA	RDOUS WASTES

- A. EPA HAZARDOUS WASTE NUMBER Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual which poisess that characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled
- C. UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE	METRIC UNIT OF MEASURE CODE
POUNDSP	KILOGRAMSK
TONS	METRIC TONS

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess t

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual
 quantity of the waste and describing all the processes to be used to treet, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter
 included with above" and make no other entries on that line.
- 3. Repeat step-2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous weste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non—listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

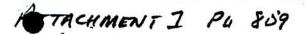
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X-2	D	0	0	2	400	P	T	0 3	D	8	0	11		
X-3	D	0	0	1	100	P	T	23	D	8	0			
X-4	D	0	0	2				J	T	TT		77		included with above

EFA Form 3510-3 (6-80)

PAGE 2 OF 5

CONTINUE ON PAGE 3





STE: Paptacopy this pane before completing if you have more than 26 wastes to list. Form Approved OMB No. 158-520-704 EPA I.D. NUMBER lenter from pace 11 FOR OFFICIAL USE ONLY GAD000814343 DUP DUP IV. DESCRIPTION OF HAZARDOUS WASTES 'communed' -. . . A. EPA MAZARD. ZO WASTENO Center code: C. UNIT D. PROCESSES B. ESTIMATED ANNUAL QUANTITY OF WASTE SURE lenter code; 1. PROCESS CODES (enter) 2. PROCESS DESCRIPTION (if a code u not entered in D(1)) :1 28800 U 00 2 S 0 1 P U 05 4 Incl. Above 3 U 05 7 Incl. Above 4 U 07 0 Incl. Above 5 U 0 7 5 Incl. Above 6 U 0 8 0 Incl. Above 7 u 11 Incl. Above 8 U 12 2 Incl. Above 9 ឋា 1 5 Incl. Above 10 U 15 9 Incl. Above 11 U 16 a Incl. Above 미괴 6 Incl. Above 13 U 2 1 0 Incl. Above 14 U 2 2 Incl. Above U 2 2 Incl. Above 16 U 2 2 6 Incl. Above 22 17 U Incl. Above 13 U 2 3 Incl. Above 19 20 21 23 23



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ENVIRONMENTAL PROTECTION AGENCY

GENERATOR ANNUAL HAZARDOUS WASTE-REPORT

This report is for the calendar year ending December 31, 1982 L. V. L.

AFFIX LABEL HERE.

GENERAL INSTRUCTIONS: If you beceived a preprinted Jabel attacted to the apading envelope in which this form was enclosed, with it is the mount may ided; it may provide the storage it and provide the cornect substitution in the appropriate section it and provide the cornect substitution in the appropriate section it is and it below blank if you did not receive a preprinted label, complete all sections REFER TO THE SPECIFIC INSTRUCTIONS CONFAINED IN THIS BOOKLET BEFORE COMPLETING THIS FORM. The information reflected in this report is required by law (Section 3002 of the Resource Consequation Recovery Acti.

Page 1 of

I. GENERATOR'S EN	A I.D. NUMBER
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II. NAME OF INSTALLATION
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III. INSTALLATION MAILING ADDRESS
15 60 60 W BRISTOLIED III
Street or P.O. Box
15 16 41 42 47 51 City or Town State Zip Code
State Zip Code
IV. LOCATION OF INSTALLATION (if different than section III above)
Street or Route number
Dava VIILLE IIIIII GIA 3010 401
15 16 41 42 47 51 City or Town State Zip Code
V. INSTALLATION CONTACT
STOPECHICULICIA BERMAIDIETTO 1111111 45
3113-1635-1661/14 SIC CODE 5013
Phone No. (area code & no.)
VI. CERTIFICATION I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.
KL.L. Browning Manager-PDC LLB101101101 3-1-83
Print/Type Name Title Signature of Authorized Representative Date Signed

1982 FORMS

ATTACHMENT 2 14 20=2

ENVIRONMENTAL PROTECTION AGENCY

Generator Annual Hazardous Waste Report (cont.)

This report is for the calendar year ending December 31, 1982

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Date rec'd: Rec'd by: VII. GENERATOR'S EPA I.D. NO.	VIII. FACILITY NAME (specify facility to which all wastes of this page were shipped)
12/4/00/00/81/14/314/314/3	ARIVEC Chemicals, Inc
1 2 13 14 15	X. FACILITY ADDRESS
IX. FACILITY'S EPA I.D. NO.	in On Eday of
EGIAIDI919101214/012141	7962 Huey Ed
16 28	Douglasuille, Ga 30133

XI. TRANSPORTATION SERVICES USED (List the name and EPA identification numbers of all transporters whose services were used during /9F2, This section to be completed only once. Do not repeat on supplemental sheets.)

Areived Chemicals, Inc GAD 990740714

		TE IDENTIFICATION		
equence #	1 "	1	Hazard Hazard	C. EPA Hazardous Waste No. See instructions) D. Amount of Waste
32	1	Waste Solvent	318	5003 5005 8 200 3 5005 8 20 0 3 3 3 3 4 4 2 50 51 9 1 7 5 5 9 60
	2	Waste Solvent Waste Oil	none	100 00
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	2			

XIII. COMMENTS (enter information by section number—see instructions)

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR ANNUAL HAZARDOUS WASTE REPORT

This report is for the calendar year ending December 31, 1981.

RECEIVED

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ENVIRONMENTAL PROTECTION DIVISION
LAND PROTECTION BRANCH

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I. GENERATOR'S EPA I.D. NUMBER

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II. NAME OF INSTALLATION
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III. INSTALLATION MAILING ADDRESS
15 16 O GO W BRIISTION Rd. 11 11 11 11 145
Street or P.O. Box
15 16 HUNT 1 HUY 85554
City or Town State Zip Code
IV. LOCATION OF INSTALLATION (if different than section III above)
15 16 HOTTOR ITINGUISTA MAY 1 1 1
Street or Route number
15 16 A 300610
City or Town State Zip Code
V. INSTALLATION CONTACT

VI CERTIFICATION

Phone No. (area code & no.)

313-635-6614

Name (last and first)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

L.L. Browning Manager-PDC

PA Form 8700 UAE-800 (Revised 10-82)

3-1-83

Print/Type Name

Title

2) Soverchewich Bernadelto

Signature of Authorized Representative

Date Signed

ATTACHMENT 3 PC ZOFZ

ENVIRONMENTAL PROTECTION AGENCY

Generator Annual Hazardous Waste Report (cont.)

This report is for the calendar year ending December 31, 1981.

VII. GENERATOR'S EPA I.D. NO.

T/A C

GAD101010181114131413

ARIVEC Chemicals, Inc

VIII. FACILITY NAME (specify facility to which all wastes on

IX FACILITY'S FPA LD NO

#GA10919101214017114

X. FACILITY ADDRESS

P.O. Boroy 1962 Hucy Rd Doughsville, Ga 30133

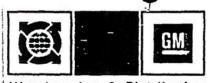
XI. TRANSPORTATION SERVICES USED (List the name and EPA identification numbers of <u>all</u> transporters whose services were used during 1981. <u>This section to be completed only once</u>. Do not repeat on supplemental sheets.)

ARIVEC Chemicals, Inc. GAD 990740714

		G . 3.		de soute s		M CT 4	2	
🖁 XII. WAST	TE IDENTIFICATION	-						e of
Line =	A. Description of Waste	B. DOI Hazard	C. EPA H Wast (see inst	lazardous e No. ructions)	D. Ar	nount of	Waste	E. Unit of Measure
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XIII. COMMENTS (enter information by section number—see instructions)

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Warehousing & Distribution
Division of General Motors Corporation

December 9, 1983

Georgia Department of Natural Resources Environmental Protection Division 270 Washington Street, S.W. Atlanta, GA 30334

RE: EPA #GAD000814343 - Doraville EPA #GAD000814350 - Chamblee

Change of Status to Small Quantity Generator

General Motors Warehousing and Distribution Division is hereby submitting a request for change in the status of the above referenced facility from full Treatment, Storage, or Disposal Facility (TSDF) to Small Quantity Generator. This change is requested due to a modification in the nature of our operations which now generate waste materials at a rate less than 1000 kilograms per month.

In addition, we are requesting deletion of the original listed wastes. The wastes were initially listed as Commercial Chemical Products ("U" numbers). However subsequent clarification of the definitions in the regulations indicate the wastes should be listed as ignitable and corrosive ("D" numbers) as shown on the enclosed revised page 3 of 5 of the Part A permit application.

Also, at this time, we are requesting that we retain our EPA ID number for future use should the nature of our operations change again.

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

L. L. BROWNING, PDC Manager Warehousing and Distribution Division of General Motors

LLB/sm Attachments



JOE D. TANNER Commissioner

ATTA CHMENT Department of Natural Resources

ENVIRONMENTAL PROTECTION DIVISION 270 WASHINGTON STREET, S.W.

ATLANTA. GEORGIA 30334

January 31, 1984

J. LEONARD LEDBETTER Division Director

Mr. L. L. Browning, PDC Manager General Motors Corporation Warehousing & Distribution 6060 West Bristol Road Flint, Michigan 48554

FILE COPY

RE: Request for Facility Status Changes for G.M. Parts Division Plant, Doraville EPA ID#GAD00814343

Dear Mr. Browning:

This will acknowledge receipt of your request for withdrawal of your application for a Hazardous Waste Facility permit.

Based on the information provided, withdrawal of your application is warranted and your permit application has been placed in our inactive files.

As requested, your status has been changed to a small quantity generator and your EPA Identification Number has been retained.

Please be avdised that withdrawal of your permit application invalidates any variance that you received to continue existing hazardous waste treatment storage or disposal during the permit review process and that based on our concurrence with your withdrawal request, the Federal Environmental Protection Agency will terminate your facility's interim status.

Should you wish to treat, store, or dispose of hazardous waste in the future, it will be necessary that a hazardous waste handling permit be issued, prior to the construction of such facilities, under authority of Section 8 of the Georgia Hazardous Waste Management Act and Section 391-3-11-.10 and.ll of Georgia's Rules for Hazardous Waste Management.

If further clarification is needed on this matter, please feel free to contact Alan Laros at 404/656-7802.

Sincerely,

John D. Taylor,

Program Manager

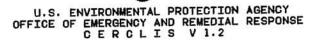
Industrial & Hazardous Waste

Management Program

JDT:a1b:12

cc: James H. Scarbrough File: GM Parts Div. (Y)

AN AFFIRMATIVE ACTION/EQUAL EMPLOYMENT OPPORTUNITY EMPLOYER



PAGE: 11 RUN DATE: 04/17/87 RUN TIME: 14:05:50

M. 2 - SITE MAINTENANCE FORM

		* ACTION: _		
EPA ID : GAD000814343				
SITE NAME: GENERAL MOTORS PARTS DIV	SOURCE: H	*		-
STREET : 4060 MOTORS INDUSTRIAL WAY	CONG DIST: 04	*		_
CITY : DORAVILLE	ZIP: 30360 * _		×	
CNTY NAME: DEKALB	CNTY CODE : 089	*		-
LATITUDE : 33/54/32.0	LONGITUDE : 084/17/15.0	* _/_/		/_/
LL-SOURCE: R	LL-ACCURACY:	* _		_
SMSA : 0520	HYDRO UNIT: 03130001	*		
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	PL DELISTING DATE:	*/_	_/_	
SITE/SPILL IDS:		*		
RPM NAME:	RPM PHONE:	*		
SITE CLASSIFICATION:	SITE APPROACH:	*		
DIOXIN TIER: REG FLD1:	REG FLD2: 6	*		
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SITE DESCRIPTION:				
WAREHOUSE FOR MOTOR VEHICLE PARTS AND AC	CESSORIES. SMALL	*		
QUANITY GENERATOR.		*	***************************************	
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U.S. ENVIRONMENTAL PROTECTION AGENCY OFFICE OF EMERGENCY AND REMEDIAL RESPONSE C E R C L I S V 1.2

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PAGE: 12 RUN DATE: 04/17/87 RUN TIME: 14:05:50

M.2 - PROGRAM MAINTENANCE FORM

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U.S. ENVIRONMENTAL PROTECTION AGENCY OFFICE OF EMERGENCY AND REMEDIAL RESPONSE C E R C L I S V 1.2

PAGE:

RUN DATE: 04/17/87 RUN TIME: 14:05:50

M.2 - EVENT MAINTENANCE FORM

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U.S. ENVIRONMENTAL PROTECTION AGENCY OFFICE OF EMERGENCY AND REMEDIAL RESPONSE C E R C L I S V 1.2

PAGE: 14 RUN DATE: 04/17/87 RUN TIME: 14:05:50

M.2 - EVENT MAINTENANCE FORM

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PAGE: RUN DATE: 04/17/87 RUN TIME: 14:05:50

M.2 - COMMENT MAINTENANCE FORM

SITE:

GENERAL MOTORS PARTS DIV

EPA ID: GAD000814343

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COMMENT

001 PART A- ON FILE

ACTION